

December 26, 1989

Environmental Protection Agency
Washington, D.C.

Attn: Director

Re: Wisconsin DNR License #1344, Badger Paper
Mill Solid Waste Landfill

Dear Director:

The following is a list of possible violations and
unanswered questions for the above mentioned reference.

- 1) Does Badger Paper Mill comply with Wisconsin
State Law 144.469; Testing Requirements.
- 2) Does Badger Paper Mill comply with Wisconsin Law
144.439 Solid Waste Storage that no person may
store or cause the Storage of Solid Waste in a
manner which causes environmental pollution.
- 3) Does Badger Paper Mill comply with Wisconsin State
Law 144.436 The Open Burning Operation.

Possible violations at Wisconsin (DNR) 1344 Badger Paper
Mill Landfill were reported to the Wisconsin DNR, November
1989 and no action was ever taken.

Because the Wisconsin DNR's has taken no action, I request
the Environmental Protection Agency to please answer these
questions; our environment needs protection against any
polluters.

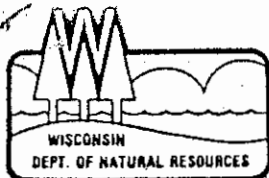
Sincerely,



Dale Pape
4194 Hwy 180
Marinette, Wisconsin
Phone (715) 735-0285

c: Wisconsin Governor/Tommy Thompson
Wisconsin Attorney General/Hannaway
Wisconsin DNR (Green Bay)/Jon Brand

STATE OF WISCONSIN
DEPT. OF NATURAL RESOURCES



SOLID WASTE FACILITY OPERATION LICENSE

AUTHORIZED CONTACT

RALPH C KINZEL, MGR ENF AF
BADGER PAPER MILLS, INC
P O BOX 149
PESHTIGO WI 54157

LICENSE NO: 01344

TYPE OF FACILITY: LANDFILL

EFFECTIVE DATE: OCTOBER 1, 1988

DATE OF EXPIRATION: SEPTEMBER 30, 1990

LICENSEE: BADGER PAPER MILLS, INC

NAME OF FACILITY: BADGER PAPER MILLS, INC

LOCATION OF FACILITY: NE 1/4 OF SW 1/4 OF SECTION 32, T30N, R23E

BADGER RD
MARINETTE COUNTY

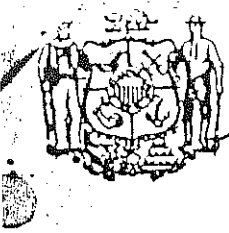
PESHTIGO pop 8K

-A MONITORING PLAN, MEETING THE REQUIREMENTS OF CHAPTERS NR 500-520, SHALL BE PREPARED AND SUBMITTED TO THE DEPARTMENT FOR REVIEW BY FEBRUARY 1, 1990. THE MONITORING SYSTEM SHALL BE INSTALLED, AND A MONITORING PROGRAM SHALL BE IMPLEMENTED AS REQUIRED IN THE DEPARTMENT'S SUBSEQUENT PLAN APPROVAL. AN EXPLANATION OF THE LEGAL CHALLENGE PROVISIONS OF CHAPTER 227 IS PROVIDED IN THE COVER LETTER WITH THIS LICENSE.

-THIS FACILITY IS SUBJECT TO A CLOSURE AGREEMENT WHICH IS INCORPORATED HEREIN BY REFERENCE PURSUANT TO SECTION 144.44(4)(G), WISCONSIN STATUTES.

THIS LICENSE AUTHORIZES THE LICENSEE TO OPERATE THE SOLID WASTE FACILITY DESCRIBED ABOVE DURING THE TERM HEREOF EXCEPT AS MODIFIED BY THE DEPARTMENT. THIS LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE PROVISIONS OF CHAPTER 144, WIS. STATS., AND CHAPTERS NR 500 - 520, WIS. ADM. CODE, ANY PLAN APPROVAL AND MODIFICATIONS THEREOF, AND ANY SPECIAL ORDER AND MODIFICATIONS THEREOF ISSUED BY THE DEPARTMENT. ANY EXEMPTIONS FROM THE REQUIREMENTS OF CHAPTERS NR 500 - 520, WIS. ADM. CODES, ISSUED FOR THIS FACILITY ARE LISTED ABOVE.

Carroll D. Besadny
CARROLL D. BESADNY, SECRETARY
DEPARTMENT OF NATURAL RESOURCES



State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES
Lake Michigan District Headquarters
1125 N. Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Carroll D. Besadny
Secretary

September 19, 1988

File Ref: 4400

Mr. Ralph C. Kinzel
Badger Paper Mills, Inc.
P.O. Box 149
Peshtigo, WI 54157

Subject: Groundwater Monitoring Plan, Badger Paper Mills, Inc.
Landfill, License No. 01344

Dear Mr. Kinzel:

We want to tell you about a new condition we are adding to the 1988-90 license for your landfill. We are telling you now so that you can begin preparing to meet the condition and budgeting for implementing it.

What is required? The condition will require you to submit a groundwater monitoring plan before February 1, 1990. You must submit three copies of the plan and associated maps and blueprints to this office on or before that date. After we approve the plan, you must install the monitoring well system within a specified period of time. You will have to sample the wells quarterly for at least two years. After that, we may allow you to cut back to semi-annual sampling.

What authority does DNR have to require this? Groundwater laws passed in 1984 (Wisconsin Act 410) allow us to require monitoring at your facility as a condition of relicensure.

Why require groundwater monitoring at your landfill? We suspect your landfill, which has been operating since before the state had requirements for site design and monitoring, may be contaminating the groundwater. Specifically, we selected your landfill based on its suspected depth to groundwater, soil type, size, surrounding water supply wells, waste type, etc.

What benefit is there to you? By installing monitoring wells now, you can demonstrate whether or not your site may be causing a problem and determine what your future liabilities may be.

What if you find groundwater contamination? Depending on the severity of the contamination, we may ask you to do additional work to determine the extent of the problem. If necessary, we will require corrective action, which obviously could be extensive. However, by checking for problems now, you could avoid an even more extensive and expensive cleanup later.

What does the monitoring plan have to include? The plan must include all the information and items listed on the attached "Necessary Elements of Monitoring

Plan" (Revised 4/88) which is based on our current solid waste rules (Chs. NR 500-520, Wisconsin Administrative Code).

Who can prepare the plan? You can prepare much of it yourself or you can hire a consulting firm to do part or all of the plan for you. The plan must be signed by a qualified hydrogeologist. To help you and your consultant prepare the plan, we are enclosing the following:

- "Necessary Elements of Monitoring Plan," revised April 1988.
- Completeness checklist for the monitoring plan, revised April 1988.
- A copy of Ch. NR 508, Wis. Adm. Code, listing current requirements for landfill monitoring.
- A blue fact sheet entitled "Chapter NR 140, Groundwater Quality Requirements."
- "Table 1," a list of sources of regional geologic information.
- The Bureau of Solid Waste Management's "Guidelines for Monitoring Well Installation," dated April 1985.
- "Groundwater Sampling Procedures Guidelines," published by the Department in February 1987.

Can you deduct any expenses associated with groundwater monitoring? If your municipality has not signed an agreement with the Department to close the landfill by 1999, you may deduct some of the costs of plan development, construction, sampling, and analysis associated with groundwater monitoring. You may deduct up to \$900 of such expenses from the \$1,000 Environmental Repair Fund base fee. You may only deduct the expenses for the calendar year in which you paid them. You should save your receipts for the expenses incurred for groundwater monitoring during each year and submit them along with your Waste Management Fund payment for that year.

Will you have to do anything else? Yes. After you begin sampling your monitoring wells, you must check the results to see if they exceed any of Wisconsin's groundwater quality standards and report any exceedances. The enclosed blue fact sheet about Ch. NR 140, Wis. Adm. Code, the groundwater quality rules, explains more about the standards and how they will apply to your landfill.

How will the new solid waste rules affect you? We have revised Ch. NR 180 and renumbered it Chs. NR 500 through 520. Chapter NR 508 contains rules for landfill monitoring, remedial actions, and infield conditions reports. Your plan must comply with these rules. We'd like to call your attention to these parts of the rules:

General monitoring requirements
Well design and installation
Well development

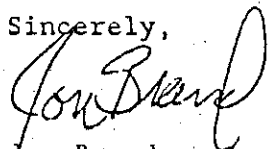
NR 508.04(1)
NR 508.05
NR 508.06

Boring and well abandonment	NR 508.07
Soil sampling	NR 508.09
Groundwater sampling and analysis (Number of wells, private wells, frequency, parameters, sampling plan, and analytical methods)	NR 508.10
Documentation	
Well construction	NR 508.11
Water sampling and analysis	NR 508.12
Boring and well abandonment	NR 508.13
Background water quality sampling (We've reduced background sampling requirements)	NR 508.14
Notification procedures	NR 508.17

In particular, please note that you will have to carefully document how you install and sample your wells. And, you will have to establish "background groundwater quality" near your landfill. (See Necessary Elements of Monitoring Plan for more details.)

What if you have questions? Please call me at (414) 497-3155 if you have questions about the groundwater monitoring plan or Wisconsin's groundwater legislation.

Sincerely,



Jon Brand
Environmental Specialist

JB:cm

Enc.

cc: Doug Rossberg - LMD, Solid Waste Coordinator
Bureau of Solid Waste Management
Stan Nogalski - Marinette Area

Exhibit
(A)

to accomplish the smokeless combustion of clean wood wastes and similar combustible materials.

(b) "Open burning" means combustion in which the by-products thereof are emitted directly into the ambient air without passing through a stack or chimney. Open burning does not include the combustion occurring at a properly operated air curtain destructor.

(c) "Population equivalent" means the population equal to the sum of the population of the geographical area based on the most recent census data, or department of administration census data used for tax sharing purposes, plus the seasonal population not included in the census data, plus one person per 1,000 pounds per year of industrial, commercial and agricultural waste.

(2) The department shall grant licenses for the open burning of solid waste at the licensee's solid waste disposal facilities if:

(a) The open burning operation serves a population equivalent of less than 10,000 or, if the operation is controlled by more than one municipality, a population equivalent of less than 2,500 for each additional controlling municipality. The department shall give consideration to seasonal variations in population in granting partial yearly burning exemptions.

(b) All portions of the licensed operation are greater than one-fourth mile from any residence or place of public gathering, or written consent is obtained from all residents and proprietors within one-fourth mile thereof.

(c) The open burning does not include the burning of wet combustible rubbish, garbage, oily substances, asphalt, plastic or rubber products and, if the open burning operation serves a population equivalent of more than 2,500, the open burning includes only wood and paper which is separated from other solid waste.

(d) The open burning operation is supervised by an attendant.

(e) The open burning operation is accomplished in a nuisance-free manner and does not create hazards for adjacent properties.

(f) Adequate firebreaks are provided and provision is made to obtain the services of the local fire protection agency if needed.

(g) The open burning operation is not in violation of any federal air pollution control rules, or any state air pollution control rules required to be adopted under applicable federal laws or regulations.

History: 1975 c. 83; 1979 c. 34 s. 984rf; Stats. 1979 s. 144.436; 1981 c. 374 ss. 31m, 31s, 148.

144.437 Solid waste management. (1) Each county board individually or jointly with another county board may prepare and adopt a county solid waste management plan consistent with state criteria.

(2) All county plans shall be submitted to the department for review. Within 90 days after submittal, the department shall approve or disapprove the plans. During its review, the department shall consult with the appropriate regional planning commission or other planning agency to determine whether any facility use and operation is in conflict with any plans adopted by such agency.

(3) The department shall by rule adopt county solid waste management criteria for the development of the plans permitted under this section.

History: 1971 c. 130; 1973 c. 305; 1975 c. 20; 1977 c. 377; 1979 c. 34 s. 984rt; Stats. 1979 s. 144.437; 1981 c. 374 s. 148; 1983 a. 27.

144.438 Exemption for certain alcohol fuel production systems. (1) DEFINITIONS. As used in this section:

(a) "Distillate waste product" means solid, semisolid or liquid by-products or wastes from the distillation or functionally equivalent process of an alcohol fuel production system.

(b) "Environmentally sound storage facility" means a facility, including a holding lagoon, which is used to store distillate waste products so that no waste products from the facility enter or leach into the waters of the state.

(c) "Private alcohol fuel production system" means an alcohol fuel production system from which no alcohol is sold and from which all the alcohol is used as a fuel by the owner.

(2) EXEMPTION. No permit, license or plan approval is required under this chapter for the owner of a private alcohol fuel production system to establish, construct or operate a system for the treatment, storage or disposal of distillate waste products if the distillate waste product is stored in an environmentally sound storage facility and disposed of using an environmentally safe land spreading technique and the storage, treatment or disposal is confined to the property of the owner.

History: 1979 c. 221.

144.439 Solid waste storage. No person may store or cause the storage of solid waste in a manner which causes environmental pollution.

History: 1981 c. 374.

144.44 Approval process; operating license. (1) DEFINITIONS. As used in this section:

(a) "Class 1 proceeding" has the meaning specified under s. 227.01 (3) (a).

(b) "Contested case" has the meaning specified under s. 227.01 (3).

(bm) "Hazardous constituent" means any constituent designated by the department under s. 144.62 (2) (c).

(c) "Informational hearing" means a hearing conducted under s. 227.18.

(d) "Release" has the meaning given under s. 144.735 (1) (b).

(e) "Surface impoundment" has the meaning given under s. 144.735 (1) (d).

(1m) LOCAL APPROVAL. (a) Definition. As used in this subsection, "local approval" has the meaning specified under s. 144.445 (3) (d).

(b) Application for local approvals required. Prior to constructing a solid waste disposal facility or hazardous waste facility, the applicant shall submit a written request for the specification of all applicable local approvals to each affected municipality. Within 15 days after the receipt of a written request from the applicant, a municipality shall specify all local approvals for which applications are required or issue a statement that there are no applicable local approvals. Prior to constructing a solid waste disposal facility or a hazardous waste facility, the applicant shall apply for each local approval required to construct the waste handling portion of the facility.

(bn) Standard notice. The waste facility siting board shall develop and print a standard notice designed to inform an affected municipality of the time limits and requirements for participation in the negotiation and arbitration process under s. 144.445. An applicant shall submit a copy of this standard notice, if it has been printed, with any written request submitted under par. (b).

(c) Attempts to obtain local approvals required. Following applications for local approvals under par. (b) and prior to submitting a feasibility report, any applicant subject to s. 144.445 shall undertake all reasonable procedural steps necessary to obtain each local approval required to construct the waste handling portion of the facility except that the appli-

Exhibit (H)

144.449 Tires dumps. (1) DEFINITIONS. In this section:

(a) "Nuisance" means an unreasonable danger to public health, safety or welfare or the environment.

(b) "Tire dump" means any location that is used for storing or disposing of waste tires.

(c) "Waste tire" has the meaning given under s. 84.078 (1).

(2) DEPARTMENT AUTHORITY; ABATEMENT. If the department determines that a tire dump is a nuisance, it shall notify the person responsible for the nuisance and request that the tires be processed or removed within a specified period. If the person fails to take the requested action within the specified period, the department shall order the person to abate the nuisance within a specified period. If the person responsible for the nuisance is not the owner of the property on which the tire dump is located, the department may order the property owner to permit abatement of the nuisance. If the person responsible for the nuisance fails to comply with the order, the department may take any action necessary to abate the nuisance, including entering the property where the tire dump is located and confiscating the waste tires, or arranging to have the waste tires processed or removed.

(2r) ENFORCEMENT ACTION. To carry out a nuisance abatement under sub. (2), the department may refer a nuisance abatement to the attorney general for enforcement action.

(3) APPLICABILITY. This section does not apply to any of the following:

(a) A retail business premises where tires are sold if no more than 500 waste tires are kept on the premises at one time.

(b) The premises of a tire retreading business if no more than 3,000 waste tires are kept on the premises at one time.

(c) A premises where tires are removed from motor vehicles in the ordinary course of business if no more than 500 waste tires are kept on the premises at one time.

(d) A solid waste disposal facility where no more than 60,000 waste tires are stored above ground at one time if all tires received for storage are processed, burred or removed from the facility within one year after receipt.

(e) A site where no more than 250 waste tires are stored for agricultural uses.

(f) A site where a recovery activity, as defined in s. 144.798 (1) (a), is carried on if no more than a 6-month inventory of tires is kept on the site.

(g) A site where waste tires are stored for use in constructing artificial reefs in waters of the state.

(h) An artificial reef constructed of waste tires.

(i) A construction site where waste tires are stored for use or used in road surfacing and construction of embankments.

(j) A solid waste disposal facility where waste tires are burred in compliance with rules promulgated by the department.

(4) ABATEMENT PRIORITIES. The order of priority for the department's abatement activities under sub. (2) shall be as follows:

(a) Tires dumps determined by the department to contain more than 1,000,000 tires.

(b) Tires dumps which constitute a fire hazard or threat to public health.

(c) Tires dumps in densely populated areas.

(d) All other tire dumps.

(5) RECOVERY OF EXPENSES. The department may ask the attorney general to initiate a civil action to recover from the person responsible for the nuisance the reasonable and necessary costs incurred by the department for its nuisance abatement activities and its administrative and legal expenses related to the abatement. The department's certification of

144.46 Shoreland and floodplain zoning. Solid waste facilities are prohibited within areas under the jurisdiction of shoreland and floodplain zoning regulations adopted pursuant to ss. 59.971, 61.351, 62.231 and 87.30, except that the department may issue permits authorizing facilities in such areas.

History: 1981 c. 374 s. 148; 1983 a. 416 s. 19.

144.465 Review of alleged violations. Any 6 or more citizens or any municipality may petition for a review of an alleged violation of ss. 144.43 to 144.47 or any rule promulgated or special order, plan approval, license or any term or condition of a license issued under those sections in the following manner:

(1) They shall submit to the department a petition identifying the alleged violator and setting forth in detail the reasons for believing a violation occurred. The petition shall state the name and address of a person within the state authorized to receive service of answer and other papers in behalf of the petitioners and the name and address of a person authorized to appear at a hearing in behalf of the petitioners.

(2) Upon receipt of a petition under this section, the department may:

(a) Conduct a hearing in the matter within 60 days of receipt of the petition. A hearing under this paragraph shall be a contested case under ch. 227. Within 60 days after the close of the hearing, the department shall either:

1. Serve written notice specifying the law or rule alleged to be violated, containing findings of fact, conclusions of law and an order, which shall be subject to review under ch. 227; or

2. Dismiss the petition.

(b) Initiate action under s. 144.47.

(3) If the department determines that a petition was filed maliciously or in bad faith, it shall issue a finding to that effect, and the person complained against is entitled to recover expenses on the hearing in a civil action.

History: 1981 c. 374.

144.469 Penalties. (1) (a) No person may treat, store or dispose of high-volume industrial waste, as defined under s. 144.44 (7) (a) 1, in violation of a testing requirement or condition of an exemption under s. 144.44 (7) (f) 4.

(b) No person may violate a testing requirement or condition of an exemption from regulation under s. 144.44 (7) (g) 3.

(c) A person who violates sub. (1) shall forfeit not less than \$10 nor more than \$25,000 for each violation. Each day of violation is a separate offense.

History: 1985 a. 46.

144.47 Violations; enforcement. (1) (a) If the department has reason to believe that a violation of ss. 144.43 to 144.47 or any rule promulgated or special order, plan approval, or any term or condition of a license issued under those sections occurred, it may:

Exhibit
E

land fill



State
Jaw 144.431 / Condensation
of water ?



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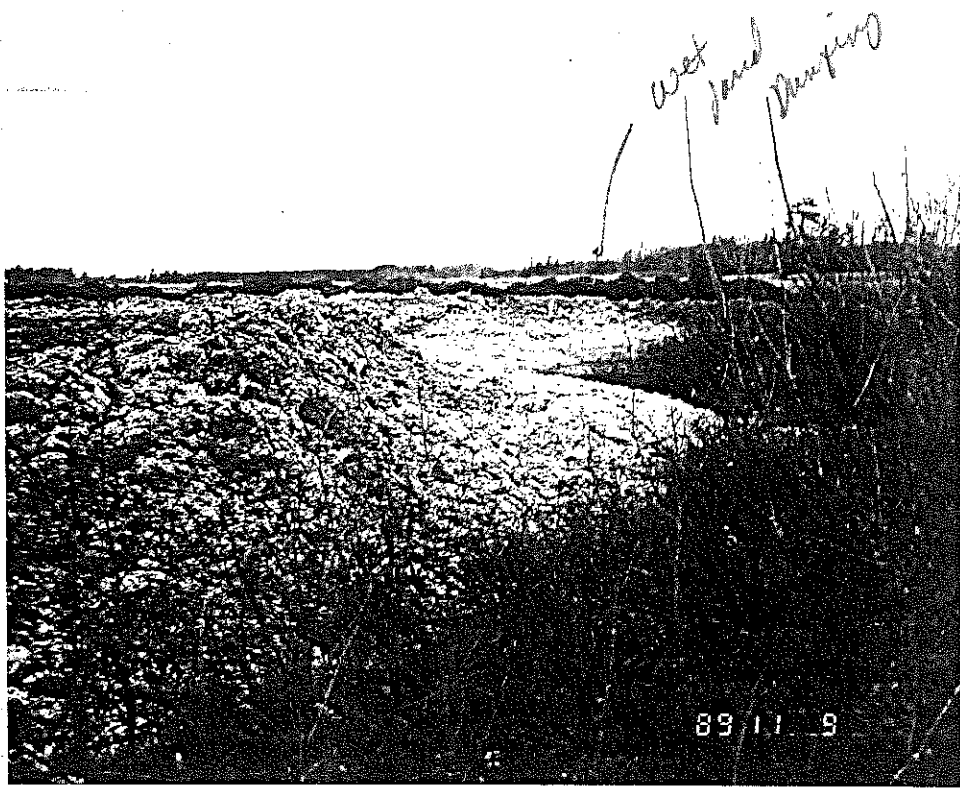
State
Jaw 144.439

water
condensation ?



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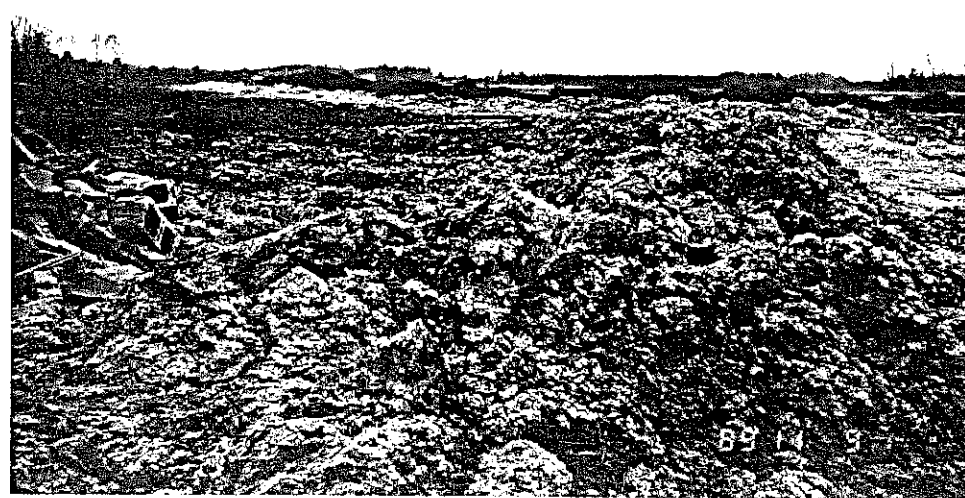




Dumping
in the
woods



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State of Wisconsin
Dept. of Natural Resources
1125 N. Military Ave.
Box 10448
Green Bay, WI 54307-0448
Attn: Jon C. Brand

October 14, 1989

Subject: Badger Paper Mill (Landfill)
DNR License No. 01344
Meeting of 10/12/89

Dear Jon,

As I discussed with you, my reason for coming to your office was to understand the DNR's functions on landfills, after my experiences with the DNR at other landfills in Wisconsin. As you may recall, I told you that I was extremely impressed with the DNR's ability to implicate standards in construction above and beyond anything I have ever seen practiced in the industry. I was even told by my employer that the DNR is the law governing the construction and will assure that the construction is in their hands. After this evaluation of the DNR, I wanted to know if the standards applied to everyone in the industry.

I brought to your office an operating landfill, DNR License No. 01344, Badger Paper Mill. You had stated to me that you know that leachate is in the water table and that this landfill is in violation of the EPA Clean Water Act, yet the DNR will allow Badger Paper Mill to dump at this site because Badger Paper Mill can't afford to comply with the DNR's laws. You also indicated to me that the DNR has priorities with the other plants, mainly because they have the money to do a clean up.

The Badger Landfill would appear to me to be a major priority because of its condition. Although I understand your reason for not invoking the laws on Badger, this would create a hardship for them, as you stated this would put a great strain on their ability to operate, even though I indicated to Jon, if you are able to produce waste you should be able to dispose accordingly to the laws that govern. You have made an obvious exception to your laws in order to save Badger from an obvious burden on their economic well being.

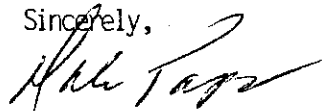
I only hope this exception doesn't continue to destroy the environment in this area.

Also, as you may note since our last meeting, I have made a discovery at the Niagara Paper Mill in Niagara, Wisconsin. Please take note to photos and information left at your office dated October 13, 1989.

Jon, it is obvious to me that standards differ project to project, my intentions at this time is to understand why?

Again, thank you for your time and honesty in taking these matters as they are all our concerns, it is my priority to know how and why things differ.

Sincerely,



Dale Pape

Dale Pape
N4194 Hwy. 180
Apt. #4
Marinette, WI 54143
Phone # 715-735-0285

State of Wisconsin
Dept. of Natural Resources
1125 N. Military Ave.
Box 10448
Green Bay, WI 54307-0448
Attn: Jon C. Brand

November 1, 1989

Dear Jon,

Please note the attached article entitled, "Badger Paper Third Quarter Report". I would think that Badger Paper could afford spending money for the environmental needs at their landfill (DNR License #01344) located in Marinette County. After reading the DNR's report on placing monitoring wells, Badger is to bring forth a plan for installation. Just how long do they get after submitting a plan for installation. Also, I never knew you had to plan for placing a well. I always thought you just simply drilled a hole and installed a monitoring device. Shouldn't the DNR give their recommendation where to install them? Would you be surprised if they wanted to place them in Brown County? I wouldn't.

I would like to know from your office how the DNR's plans to get a grip on this and what the damage is to our environment at this site. When something is in violation of the laws don't we enforce them? Could you explain to me how Badger can keep operating this way? I really can't see the money problem; can you? I am asking you just what action the DNR is going to take? I would think, if in doubt of what is happening to our environment someone in the DNR would request to find out.

Please inform me if you need help with this site. I will be glad to help in any way I can. Our environment needs everyones' attention before it is all destroyed.

Sincerely,



Dale Pape
Environmental Consultant

earnings.

The council will also survey the progress that is being made in revising MESC forms so they are more easily understood by employers and claimants. In addition, the council will seek reaction from Upper Peninsula employers to MESC's computer crossmatch program, that detects potential fraud in the unemployment insurance system. As part of the crossmatch program, all Michigan employers are required to submit wage information for each of their employees every quarter.

Another agenda item for the meeting is pending legislation that may affect the state's unemployment insurance program.

Davidson said the council will welcome any comments or formal presentations from the public who attend the meeting.

The MES Advisory Council studies MESC policies, UI and Job Service legislation and possible law changes. The council then recommends changes it believes advisable to the governor, MES commissioners and the state legislature.

The governor appoints council members.

Badger Paper third-quarter report

PESHIGO, Wis. — Badger Paper Mills Inc. reported third quarter and nine months of 1989 sales and earnings. Edwin A. Meyer, Jr., chairman and executive officer, along with Bennie C. Burish, president and chief operating officer, announced preliminary results for the third quarter and nine months of 1989 compared to the same period of 1988.

Sales for the quarter were essentially the same as reported in 1988. Net earnings amounted to \$1,249,000 as compared to \$1,448,000 for the same period a year ago.

Net sales for the nine months ending Sept. 30, 1989, were up 8 percent to \$58,113,000 from \$53,688,000 in 1988. Net earnings increased 22 percent and totaled \$3,776,000 compared to \$3,091,000. Earnings per share increased to \$1.91 from \$1.56.

Badger Paper Mills Inc. produces fine and specialty products, including printing and writing papers, xerographic, stock computer papers, M.G. laminating grades, plain and printed waxed papers and various other specialty products at its manufacturing and converting facilities located in Peshtigo, Wis. Badger products are marketed under the trade names Ta-Non-ka, Copyrite, BPM, SHARPrint and FRESHrap.

operation.

Jed Barley, operator of J.C.'s Goldworks, 1313 10th St., sharing a building with State Wide Real Estate of Menominee, said his training as a graduate gemologist gives him basic skills in diamond grading and gemstone identification.

But it is his experience in giving demonstrations and instruction to other professionals, he said, that makes it easy for him to do his work in front of his customers.

"A lot of people like to look over the bench and watch. I don't mind at all," Barley said.

Barley said he does a lot of same-day repairs, including work for people who sometime feel uncomfortable dropping off their jewelry and leaving it for repair. While concerns about leaving rings and other items may be unfounded, they are real to the people who have them, he said, and he believes his style of work can allay those concerns.

"If they feel more at ease by pulling up a chair and watching, that's their option," Barley said.

Barley said he works mainly in gold, but can work in all kinds of metal and with all types of jewelry.

J.C.'s Goldworks is open weekdays 8 a.m.-5 p.m.



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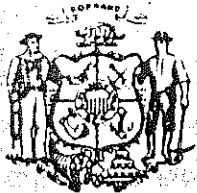
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University of Wisconsin-Marinette
November 7—December 12



State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 N. Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

December 4, 1989

File Ref:

4400

CERTIFIED MAIL

Mr. Dale Pape
N4194 Hwy. 180
Apt. #4
Marinette, WI 54143

Dear Mr. Pape:

Subject: Solid Waste Regulations - Badger Paper Mills (BPM),
Peshtigo and Niagara of Wisconsin (NOW), Niagara.

Over the last several months Department solid waste staff have talked to you about solid waste regulations which apply to landfills owned and operated by BPM and NOW, respectively. Following our discussion in early October you send me several letters, one regarding BPM and the other NOW. Then in early November I received another letter regarding BPM.

I have been out of the office for much of the month of November and therefore unable to respond to your letters until now. Please accept my apology for the delay in getting back to you.

First, I will respond to your letter regarding Niagara of Wisconsin, then the two on Badger Paper Mills. Department solid waste regulations as they apply to these licensed solid waste facilities will be stated along with some general information on each facility.

The NOW solid waste facility (license # 2964) operates under a plan of operation approval issued on March 15, 1982. It is also subject to compliance with State Statutes and Wisconsin Administrative Code, NR 500-520. It is licensed to accept fly ash resulting from the combustion of wood and bark, pulverized coal and stoker coal from the generation of steam used in the manufacture of paper. No hazardous waste, toxic waste, liquid waste or unusual chemical wastes can be disposed of at this site. Also, dewatered pond dirt and wood chips, not to include highly decomposed wood chips or bark may be disposed of at the site. Mill refuse can not be disposed of at this site. The filling is limited to 10.33 acres with a maximum disposal capacity of 182,716 cubic yards. They are required to sample 3 monitoring wells on a quarterly basis.

According to David Schmutzler of NOW, there is approximately two years of remaining site life. In a conversation with Mr. Schmutzler on August 10, 1989 I stated that because the site is a natural attenuation type landfill in a sandy soil environment the Department could not justify approving any type of proposed expansion. And NOW should be looking at a site such as Marinette County's Mid-County landfill for future disposal of their waste.

As for the Badger Paper Mills landfill (license # 1344), it was originally licensed on January 4, 1971. It is subject to compliance with State Statutes and Wisconsin Administrative Code NR 500-520. The design capacity of this site is 50,000 to 500,000 cubic yards, has a licensed acreage of 50 acres and is a natural attenuation site. It is authorized to accept papermill sludge and ash residue. Also, it is subject to a closure agreement as specified in s. 144.44(4)(g) Wisconsin State Statutes. According to this agreement the facility must close on or before July 1, 1999.

As stated in BPM present license they are required to submit a groundwater monitoring plan, meeting the requirements of NR 500-520. It is to be prepared and submitted for Department review by February 1, 1990. A monitoring system will be installed, and a monitoring program implemented as required by the Department's subsequent plan approval.

The review time for such a plan is dependent on how thorough the plan submittal is. The request for additional information would lengthen the review time. Typically review of such a plan can take 3 to 6 months. One of the major concerns the department has is the placement of wells. They should not be placed in waste but close enough (within 100 ft) to determine any impact. Also that there are downgradient wells (2 or 3) and upgradient wells (at least 1). In some cases the Department will state in the approval where certain groundwater wells must be placed. After the wells are installed sampling begins. Data on specified parameters is submitted quarterly. The Department reviews this data for compliance with the groundwater standards. If groundwater contamination is apparent, actions outlined in Wisconsin Administrative Code NR 140-- Groundwater Quality will be initiated. I hope I have clarified the Department's solid waste regulations as they pertain to BPM and NOW licensed landfills. If you wish to further discuss these facilities please feel free to contact me at (414) 497-3155.

Sincerely,
Don C. Brand
Don C. Brand
Industrial Waste Specialist

John Brand, DNR
Told Mike Brandt NBC News
That Badger Complies with
the Law. That they
inspected this site and
found things OK.

That (BPM) will have the right
to dump what they want at this
site (with Badger's approval)
Bill Please
Note

MEETING: 12 OCT 88

DAVE PAPE

DENNIS PAPE

TOXIC SPILL 20540 89 - unknown chemical comp. -



STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

JON C. BRAND
ENVIRONMENTAL SPECIALIST
INDUSTRIAL WASTE

1125 N. MILITARY AVE.
BOX 10448, GREEN BAY, WI 54307-0448

(414) 497-3155

SEP 10 1991

5HR-12

Mr. Ralph Kinzel
Badger Paper Mills
West Front Street
Peshtigo, Wisconsin 54157

Re: Land Disposal Restrictions
Badger Paper Mills
WID 006 130 322

Dear Mr. Kinzel:

On July 10, 1991, the Wisconsin Department of Natural Resources (WDNR), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986; for California List wastes on July 8, 1987; First Third wastes on August 8, 1988; Second Third wastes on June 8, 1989; and Third Third wastes on May 8, 1990, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Sharon R. Travis of my staff at (312) 886-6533.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Barbara Zellmer, WDNR
Ed Lynch, WDNR
Carol Schmidt, WDNR

bcc: Compliance file

S.TRAVIS:SG:08/02/91:disk #1 RADER/Filename:LDR-KINZ

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
<i>Cal</i> <i>9-18-91</i>	<i>MT</i> <i>9-18-91</i>				<i>PSD</i> <i>9-18-91</i>				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Badger Paper Mills Inc.
 U.S. EPA ID No.: WID 006130322
 Street: West Front Street
 City: Peshigo State: WI Zip: 54157
 Telephone: (715) 582-4551

Inspection Date: 7/6/91 Time: 10:30 (am/pm)

Weather Conditions: Warm & Sunny

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Carol M. Schmidt</u>	<u>DNR/H.W. Inspector</u>	<u>(414) 492-5871</u>

Facility Representatives: Ralph C. Kinzel Badger/Mgr. Env. Affairs (715) 582-4551

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	<u>X</u>	_____	_____	_____	_____

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

parts cleaning - general maintenance

LDR Waste Management:

*Safety-Kleen parts cleaner unit.
Recycled petroleum naphtha.*

Summary: *See copy of inspection form & letter enclosed.*

Signature: *Carol M. Schmidt*

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☐ NA ☒

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:

Deol

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

Assigned ClassificationCorrect Classification

*Areas of concern include: California list/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ☒

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ___ NA ___

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]
 Yes ☐ No ☒ List _____
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
- *Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]
 Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
<u>D001</u>	_____	_____	<u>✓</u>
_____	_____	_____	_____
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes _____ No _____ NA ✓

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes _____ No _____ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes _____ No _____ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes _____ No _____ NA ✓

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs
 _____ ≥ 500 ppm PCBs

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments Has Contract with Safety-Kleen for Notice of Land Disposal
Restriction of Waste - #703196 - (parts cleaning unit)

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☒

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Relies on Safety-Kleen (TSD) to do representative sample analysis - see copy attached

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☐ No ☒ NA ☐

Representative sample analysis done - not specifically on Badger Paper Mills' waste.

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☐ No ☒

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001	Safety-Kleen

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

- b. Are a notification and a certification sent with each waste shipment?

Yes ____ No ____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ____ No ____ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ____ No ____

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ____ No ____ NA ____ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ____ No ____

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ____ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☐ No ☒ *Has contract & notice covers all wastes shipped under CMS contract 703196.*

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☒ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
<u>D001</u>	<u>Safety-Kleen</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☒ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ___ No ☒

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the third third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments Gen. did, however, have one notification on file.

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes _____ No _____ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
-------------------	--------------------------	--------------------------------------

[illegible]

2. Are treatment residuals generated from these units?

Yes _____ No _____

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

[illegible]

Handwritten signature: Kinzel

5HR-12

Mr. Ralph Kinzel
Badger Paper Mills
West Front Street
Peshtigo, Wisconsin 54157

Re: Land Disposal Restrictions
Badger Paper Mills
WID 006 130 322

Dear Mr. Kinzel:

On July 10, 1991, the Wisconsin Department of Natural Resources (WDNR), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986; for California List wastes on July 8, 1987; First Third wastes on August 8, 1988; Second Third wastes on June 8, 1989; and Third Third wastes on May 8, 1990, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Sharon R. Travis of my staff at (312) 886-6533.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Barbara Zellmer, WDNR
Ed Lynch, WDNR
Carol Schmidt, WDNR

bcc: Compliance file
S.TRAVIS:SG:08/02/91:disk #1 RADER/Filename:LDR-KINZ



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

Lake Michigan District Headquarters
1125 N. Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448
TELEPHONE # (414)492-5800
TELEFAX # (414)492-5913

July 15, 1991

File Ref:438039250

Mr. Ralph Kinzel
Badger Paper Mills
West Front Street
Peshtigo, WI 54157

CERTIFIED MAIL RETURN RECEIPT REQUESTED

SUBJECT: LARGE QUANTITY GENERATOR HAZARDOUS WASTE
EPA ID #WID006130322

Dear Ralph:

Thank you for your cooperation during my July 10, 1991 hazardous waste inspection of Badger Paper Mills. During that inspection I noted the following shortcomings that will need your attention to bring Badger Paper Mills into full compliance with state hazardous waste regulations.

Section NR 615.07, Wisconsin Administrative Code, requires identification numbers obtained from the EPA. You have a number for the West Front Street location; however, you have been combining your waste streams under one number to include the Pine Street location. You explained the two facilities are contiguous by an underground tunnel.

Action Required The tunnel connecting the two facilities is not a passageway to transport your hazardous waste between facilities. I refer you to NR 600.03, Definitions. We discussed number 104, "individual generation site." Number 150 further explains "contiguous property." Highway 41 (French Street) and Pine Street is travelled between facilities. That, along with the tunnel not being accessible to the transporting of the hazardous waste and each location having a separate street address does require individual EPA ID numbers. The generation rates at the West Front Street location combined with the Pine Street location are very small quantity generator rates (about 115 pounds per month). Therefore, if you choose to manifest, you will be required

to obtain a separate ID number for the Pine Street location from the EPA. I am sending you a notification packet under separate cover. Please advise me of your intentions in writing.

Section NR 615.06 requires the generator keep records of any test results, waste analysis, or other determinations be retained for at least three years from the date that the waste was last sent to an off-site treatment, storage, or disposal facility.

Action Required You were unable to supply a copy of any test results or waste analysis on the day of inspection, although you were aware that Safety-Kleen had performed an analysis. Thank you for the faxed I received on July 15, 1991. This representative sample analysis was not performed specifically on Badger Paper Mills' waste.

Section NR 615.08 (6) requires the generator to send the designated manifest copy within five business days to the Department.

Action Required You did locate some missing copy 1's from your billing department which I am in receipt of. In a telephone conversation on July 15, 1991, you stated you found several other original copy 1's which you have mailed to me. Please continue your file search to locate all original copy 1's.

Section NR 615.08 (7) requires the generator to maintain file copies of the manifest (copy 2 and Copy 5) for a period of three years from the date the waste was accepted by the initial transporter and be available for inspection by the Department.

Action Required You did locate some of the missing file copies; however, you are still searching for complete file records. Continue to search assuring complete files containing copies 2 and 5. Please send me written documentation when your file is complete.

You are not aware that Badger Paper Mills is under the Customer Owned Machine Service Contract with Safety-Kleen. This tolling agreement is in compliance with the Land Disposal Restrictions. Your contract number is 703196. Please review option 'B' of the Notice of Land Disposal Restriction of Waste which you gave me a copy of. I've enclosed a copy with highlighted areas for your review.

Please be reminded you will need to correct manifest WIJ121146. Although you could not locate a copy of that manifest at the time of inspection, a printout of your manifest activity indicates multiple waste codes were used on that manifest. Instead of the correct waste code of D001, the department's data entry was made using D039 (because you gave two waste codes); thereby indicating you may generate two separate waste streams. Photocopy copies 2 and 5, cross out D039 and highlight D001. Write "Corrected Copy" on the manifests, list "D039 also applicable" in part 'J' of the manifest followed by your signature and the date.

Currently Badger Paper Mills is classified as a large quantity generator by the U.S. Environmental Protection Agency (EPA). Based on my inspection, I believe that Badger Paper Mills is more appropriately classified as a very small quantity generator. I will process the appropriate status change form to the EPA as well as our Department. Please refer to the applicable regulations, NR 610.07, Wisconsin Administrative Code.

Enclosed is a copy of my inspection form for your files. I believe that 30 days should be adequate to resolve the above deficiencies. Please send me a formal letter documenting how the deficiencies have been resolved within the time limit established. Feel free to contact me at (414) 492-5871 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Carol Schmidt".

Carol Schmidt
Hazardous Waste Inspector

CS/jr

cc: Aggie Cook SW/3

NOTICE OF LAND DISPOSAL RESTRICTIONS OF WASTE

TO: Safety-Kleen Corp.
 (Designated Facility)
2100 Badger Rd., Kaukauna, WI 54130
 (Address)

EPA ID No.: WID 981 187 297
 (Designated Facility)

Option A: Under manifest number _____, of sales/service acknowledgement number _____, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

Option B: I am a small quantity generator (100-1,000 kg/mo). This notice covers all wastes shipped under the following Machine Placement and/or Customer Owned Machine Service (CMS) Contract (s): 703196
 A copy of this notice will be filed with the contract (s) for five (5) years beyond their termination.

(Check boxes that apply) Waste Name	EPA Waste Code	The Waste May Contain the following Restricted Constituents	Treatment Standard (mg/l) or Method
<input checked="" type="checkbox"/> Waste Petroleum Naphtha	D001	Ignitable liquid	incineration, fuel substitutions or recovery.
		Halogenated organic compounds (above 1000 mg/l) may include:	See individual standards per 40 CFR 268.41 (a)
		-Methylene chloride	0.96
		-Tetrachloroethylene	0.05
		-Toluene	0.33
		-1,1,1 trichloroethane	0.41
		-Trichloroethylene	0.091
		-Xylene	0.15
<input type="checkbox"/> Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D008	All of the above, plus: -Cadmium	0.14
<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion Cleaner	F002, F004	-Lead (low lead subcategory)	0.51
<input type="checkbox"/> Waste Perchloro- ethylene	F002	Cresylic Acid	0.75
<input type="checkbox"/> Waste Trichloro- trifluoroethane	F002	1, 2-dichlorobenzene	0.125
<input type="checkbox"/> Waste Trichloro- ethane	F002	Methylene chloride	0.96
<input type="checkbox"/> Waste Paint Related Material	F005, F003, D001, D006, D008	Tetrachloroethylene	0.05
		Trichlorotrifluoroethane	0.96
		Trichloroethane	0.41
		Acetone	0.59
		Methyl Ethyl Ketone	0.75
		Methyl Isobutyl Ketone	0.33
		Toluene	0.33
		Xylene	0.15
		Cadmium	0.14
		Chromium	0.094
		Lead (low-lead subcategory)	0.51
		Ignitable liquid	incineration, fuel substitution or recovery

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical (s) used, and the process which created the waste).

Generator Name: Badger Paper Mills EPA ID#: WID0006130320
 Generator Signature: [Signature] Date: 11/20/90
 Printed Name and Title of Representative: DAN J. HANSEN Pipolite

Safety-Kleen Corp. manages the above wastes through its recycling and fuels programs in accordance with all applicable elements of the land disposal restrictions.

SAFETY-KLEEN CORP.
KLEIN RECYCLE CENTER
SAMPLE ANALYSIS - SUMMARY REPORT

DATE: 6/13/91
MANIFEST: 145118133

SK SAMPLE: 106-462

MATERIAL SUBMITTED AS: waste petroleum naphtha

SOURCE OR DESTINATION: Rankama 1850

TOTAL GAL= 6633 MS= 5472 BSW= 1161 H2O= 0 BSW+H2O= 1161

SK SOP 9921 REV. 6/90

NOTEBOOK/PAGE

ANALYST

COLOR (APHA)

SK SOP 9401 REV. 8/89

NOTEBOOK/PAGE

ANALYST

FLASH POINT

SK SOP 9901 REV. 8/89

NOTEBOOK/PAGE

ANALYST

GENERAL COMPOSITION (BSW)

WATER (free)

BOTTOMS SEDIMENT

SOLVENT (feedstock)

TOTAL 100%

SK SOP 9209 REV. 2/90

NOTEBOOK/PAGE

ANALYST

SOLVENT COMPOSITION WT % BY GC (UNLESS NOTED)

MECL

FTF

111

TCE

MEK

TOL

EG

MS

BENZ

ACE

ETAC

ODCB

OTHERS

PERC

DEG

ACCEPT AS:

REJECT BY LAB - REASON:

COMMENTS:

REVIEW BY:

DATE: 6-18-91

LMD
DNR District

WID006130322
EPA ID Number

STATE OF WISCONSIN
Department of Natural Resources
Large Quantity Hazardous Waste Generator Inspection Form
Chapter NR 615, Wis. Adm. Code

A. General Information:

Corporate/Facility Name: Badger Paper Mills Inc.

Facility Location:

Street: West Front Street / Pine Street

City: Poshtigo County: Marquette Zip Code: 54157

Contact Person: Ralph C. Kinzel Title: Mgr. Env. Affairs

Facility Mailing Address:

Street: 200 W. Front Street, P.O. Box 149

City: Poshtigo State: WI Zip Code: 54157

Phone: (715) 582-4551

Operator: _____ Title: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Phone: _____

Legal Owner: Badger Paper Mills Inc. Title: _____

Street: - Same -

City: _____ State: _____ Zip Code: _____

Phone: _____

Company Product/Main Process: Mfg. pulp & paper pdts.

DNR District Inspector: _____

II. REQUIREMENTS

A. Notification: (NR 615.07)

1. Has the generator submitted a notification form to the Department and obtained an identification number?

☒ Yes ☐ No

But must notify separately at Pine Street location.

Comments or Clarification

If the generator has changed its ownership or has added new hazardous waste activities, has a subsequent notification form been completed?

☐ Yes ☐ No

N/A

Comments or Clarification

If the generator has changed its corporate name (no change in ownership), mailing address and/or waste codes, has a letter to DNR and EPA or a subsequent notification form been completed?

☐ Yes ☐ No

N/A

Comments or Clarification

For Department Use

B. Waste Determination: (NR 615.06)

1. Has an adequate determination been made to identify, and if necessary, test a representative sample of each waste in order to obtain enough information to treat, store or dispose of the waste properly off-site?

☒ Yes ☐ No

This was done by Safety-Kleen; however, a copy was not available at time of

Comments or Clarification

inspection. Representative sample analysis - not specific from

Note: Records of any test results, waste analysis or other determinations must be retained for at least 3 years from the date that the waste was last sent to an off-site treatment, storage or disposal facility.

budget -
Copy
Sent 7/15/91

Generates Spent Solvents at West Front St. and Pine Street - Adjoined by a tunnel - but 2. not a passage way - 4 (French Street) Pine Street - Hwy - and along must be traveled between facilities.

2. If any process changed that affected solid waste characteristics, has the generator made a new hazardous waste determination? (NR 615.06(4))

☐ ☒
Yes No

Comments or Clarification

For Department Use

C. Waste Stream Information and Waste Handling

Waste Type	Potential Hazardous Constituents/ Characteristics	Generation Rate	Hazardous Waste Code	Waste Handling*/ Container	Disposal Site	Treatment Site	Storage Site
1) <i>Waste</i> <i>potent naphtha</i>		<i>115 #/mo.</i>	<i>D001</i>	<i>parts cleaning unit - Safety-Kleen</i>			
2)							
3)							
4)							
5)							
6)							
7)							
8)							
9)							
10)							

Attach waste profile or analysis for each waste stream or indicate how the facility has complied with NR 615.06, Hazardous Waste Determination, for each waste stream.

* Waste handling - Use the following codes to indicate how the waste is handled:

1. Treated, stored, or disposed in an on-site facility which has received an operating license, interim license, variance or waiver, or is exempt from licensing.
2. Recycled in an on-site recycling facility which has received an operating license, interim license, variance or waiver, or is exempt from licensing.
3. Delivered to an off-site treatment, storage, disposal or recycling facility which:
 - a. For facilities located outside of Wisconsin, is permitted by the EPA, is exempt from permitting or has interim status under RCRA or is permitted or approved by an authorized state.
 - b. Has been issued a hazardous waste operating license or interim license, variance, waiver, or exemption from licensing.
4. Stored at a satellite accumulation area and then handled by methods 1-3 or other methods (NR 615.05(4)(c)).
5. Other _____

D. 90-Day Accumulation: (NR 615.05(4)(a) & 615.09(2)(a))

1. Indicate how the hazardous waste is stored:

☒ Containers ☐ Tanks

NOTE: Containers and tanks are the only means allowed to store large quantities of hazardous waste and be eligible for the 90-day exemption. Any other means of storage, such as waste piles, require an interim or operating storage license/variance. (See the definitions of container, tank and pile in (NR 600.03).

2. Are the above mentioned containers or tanks marked with the date on which hazardous waste was first placed in the container or tank for accumulation?
(NR 615.05(4)(a)4)

☐ Yes ☐ No

N/A parts cleaning unit
Comments or Clarification

3. Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage facility? (NR 615.09(2)(a))

☐ Yes ☐ No

N/A parts cleaning unit
Comments or Clarification

4. Is the hazardous waste removed from the site before the end of the 90-day accumulation period or treated, stored or disposed of in an approved on-site hazardous waste facility or on-site recycling facility? (NR 615.05(4)(a)1a or b)

☒ Yes ☐ No

Comments or Clarification

Note: Attach to this form, as appropriate, a completed container inspection attachment. Complete the appropriate questions for generators as specified on that form.

For Department Use

E. Satellite Accumulation (NR 615.05(4)(c))

1. Does this facility accumulate waste at or near the generation point?

☐ Yes ☐ No

N/A
Comments or Clarification

If no, skip the rest of section E.

If yes, continue below:

- a. Is the container in good condition? (NR 615.05(4)(c)1)

☐ Yes ☐ No

Comments or Clarification

- b. Is the container always closed except when it is necessary to add or remove waste? (NR 615.05(4)(c)2)

☐ Yes ☐ No

✓
Comments or Clarification

- c. Is the container lined or compatible with the waste being accumulated?
(NR 615.05(4)(c)4)

☐ Yes ☐ No

N/A
Comments or Clarification

- d. Is the container marked with words "Hazardous Waste" or with other words that correctly identify the contents of the container? (NR 615.05(4)(c)5)

☐ Yes ☐ No

Comments or Clarification

If any of the answers to a,-d, are no, then action must be taken to correct the situation.

- e. Has more than 55 gallons of hazardous waste accumulated at or near the generation point? (NR 615.05(4)(c)6)

☐ Yes ☐ No

Comments or Clarification

- f. Has more than one quart of acutely hazardous waste listed in section NR 605.09(2)(a), Table II, or (3)(b), Table IV, accumulated at or near the generation point? (NR 615.05(4)(c)6)

☐ Yes ☐ No

Comments or Clarification

If the answer to either e. or f. is yes, then the facility must comply with applicable generator requirements.

For Department Use

F. Manifest System, Packaging, Labeling, Marking and Shipping:
(NR 615.08, 615.09, 615.11(2), 615.12 & 615.13)

1. Does the generator initiate a uniform manifest form with all off-site shipments of hazardous waste? (NR 615.08(1))

☒ []
Yes No

Comments or Clarification

NOTE: If the state to which the shipment is manifested (consignment state) supplies the uniform manifest form and requires its use, then the generator shall use that manifest form. If the consignment state does not supply the uniform manifest form, then the generator shall use the Wisconsin uniform manifest form.

2. Are the manifests properly completed? (NR 615.08(8)(a)-(l))

☒ []
Yes No

Comments or Clarification

3. Are copies of all manifests for the past 3 years retained at the facility and available for review? (NR 615.08(7))

☒ []
Yes No

However, not all could be located on day of inspection. Will continue to work on retrieving all required copies.

NOTE: Records of past shipments (manifests) must be retained at the facility for at least 3 years after the date of shipment.

4. Does the manifest specify a designated facility which is approved (if in Wisconsin has an operating license, interim license, variance, waiver, or is exempt from licensing; or if outside of Wisconsin has an EPA permit, interim status, or is exempt from permitting under RCRA; or has a permit or approval from an authorized state) to take the waste? (NR 615.08(3))

☒ []
Yes No

Comments or Clarification

- ☐ Yes ☐ No

Comments or Clarification

- ☐ Yes ☒ No

Comments or Clarification for all copy 1's.

receiving the copy from that facility. (NR 615.08(10))

- ☒ Yes ☐ No

- ☒ Yes ☐ No

on criteria specified in (NR 615.08(8)(j)).

- ☒ Yes ☐ No

materials and any handling codes listed.

- ☒ Yes ☐ No

- ☒ Yes ☐ No

- ☒ Yes ☐ No

For Department Use

G. Reporting: (NR 615.11(1))

1. Have annual reports covering generator activities during the previous calendar years been submitted (they must be submitted to the Department within 90 days after the close of the calendar year?)

☒ []
Yes No

Comments or Clarification

For Department Use

H. Contingency Plan and Emergency Procedures: (NR 615.05(4)(a)5 & 630.22

1. Does the facility have a written contingency plan addressing potential discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water? (NR 630.22(1)(a))

☒ []
Yes No

Comments or Clarification

If the answer is yes, then answer questions #2 through #8 below. If the answer is no, then indicated below what measures are being taken to prepare the plan. The Contingency Plan and any revisions to the plan that become necessary are required to be submitted to the Department. The plan must comply with (NR 630.22(1)(e)). An existing spill prevention control and countermeasure (SPCC) plan may be amended to comply with this requirement.

-
2. Is a copy of the contingency plan kept at the facility?
(NR 630.22(1)(b))

☒ []
Yes No

Comments or Clarification

3. Is a copy of the contingency plan and all revisions kept at the facility and have they been filed with the Department and been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services?

(NR 630.22(1)(b))

Copies given to police, fire depts. & hospital

☒ []
Yes No

except for the Department - N/A USQG
Comments or Clarification

4. Does the plan identify the name, position, address, phone numbers (office and home) of an Emergency Coordinator who is always on-site when the facility is in operation, and if appropriate, alternatives? (NR 630.22(1)(e)1)

☒ []
Yes No

Comments or Clarification

5. Does the plan identify an Emergency Coordinator who will be present or on call when the facility is not in operation and available to respond to an emergency by reaching the facility in a short period of time? (NR 630.22(1)(e)1)

☒ []
Yes No

Comments or Clarification

6. Are the person or persons identified in #4 and #5, above, familiar with all aspects of site activities and contingency plan implementation? (NR 630.22(1)(d))

☒ []
Yes No

Comments or Clarification

7. Do the person or persons identified in #4 and #5, above, have the authority to carry out all actions necessary to respond to fire, explosions, or any unplanned discharge of hazardous waste to the air, soil or surface water? (NR 630.22(1)(d))

☒ []
Yes No

Comments or Clarification

8. Does the plan contain the following:

- a. A description of the facility layout, types of waste handled and their associated hazards, places where facility personnel normally work, and entrances to and roads inside the facility? (NR 630.22(1)(e)2)

☒ []
Yes No

does not include waste petro. naphtha
Comments or Clarification

- b. An evacuation plan for the facility personnel, including signal(s) to be used to begin evacuation, evacuation roads, and alternative routes?
(NR 630.22(1)(e)3)

☒ Yes ☐ No

Comments or Clarification

- c. Procedures for emergency shutdown of facility operations, and the actions facility personnel must take to comply with NR 630.22(1)(a) in response to fires, explosions or any unplanned discharge of hazardous waste or hazardous waste constituents to the air, land or surface water at the facility, including procedures to:

- 1) Activate internal facility alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable? (NR 630.22(2)(a)1)

☒ Yes ☐ No

(in draft form)

Comments or Clarification

- 2) Telephone the Division of Emergency Government (at (608) 266-3232) and comply with the requirements of s. 144.76, Stats., and Chapter NR 158, Wis. Adm. Code? (NR 630.22(2)(a)2)

☒ Yes ☐ No

Comments or Clarification

- 3) Immediately identify the character, source, amount, and areal extent of any discharged materials? (NR 630.22(2)(a)3)

☒ Yes ☐ No

Comments or Clarification

- 4) Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion? (NR 630.22(2)(a)4)

☒ Yes ☐ No

Comments or Clarification

- 5) Immediately notify appropriate local authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the facility, and that evacuation of local areas may be advisable? (NR 630.22(2)(a)5)

☒ ☐
Yes No

Comments or Clarification

- 6) Take all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, reoccur, or spread to other hazardous waste at the facility? (NR 630.22(2)(a)6)

☒ ☐
Yes No

Comments or Clarification

- 7) Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, where appropriate, if the facility stops operation in response to a fire, explosion or discharge? (NR 630.22(2)(a)7)

☒ ☐
Yes No

Comments or Clarification

- 8) Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency? (NR 630.22(2)(a)8)

☒ ☐
Yes No

Comments or Clarification

- 9) Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed? (NR 630.22(2)(a)9)

☒ ☐
Yes No

Comments or Clarification

- 10) Notify the Department, the Regional Administrator and the appropriate local authorities before operations are resumed? (NR 630.22(2)(b))

☒ ☐
Yes No

Comments or Clarification

- d. Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the facility? (NR 630.22(1)(e)5)

☒ ☐
Yes No

Comments or Clarification

- e. An up-to-date list of all emergency equipment at the facility, including the location, physical description and a brief outline of its capabilities for each item? (NR 630.22(1)(e)6)

☒ ☐
Yes No

Comments or Clarification

9. Does the contingency plan need to be amended due to any of the following changes? (NR 630.22(1)(c)1-5)

☐ ☒
Yes No

Comments or Clarification

If yes, specify change below:

- a. Facility operating license, interim license, variance or waiver was amended?

☐ ☐
Yes No

N/A

Comments or Clarification

- b. Contingency plan failed in an emergency?

☐ ☐
Yes No

Comments or Clarification

- c. Facility changed design, construction, operation, maintenance or other circumstances which increased the potential for emergencies or changed the emergency response?

☐ ☐
Yes No

Comments or Clarification

- d. Has the list of emergency coordinators changed?

☐ ☐
Yes No

Comments or Clarification

- e. Has the list of emergency equipment changed?

☐ ☐
Yes No

✓

Comments or Clarification

For Department Use

I. Preparedness and Prevention: (NR 630.21)

1. Does the facility have the following equipment, as applicable for the type of waste managed? (NR 630.21(2))

a. Internal communications and alarm systems?

☒ []
Yes No

Comments or Clarification

b. A device to summon emergency assistance, such as a telephone or a 2-way radio?

☒ []
Yes No

Comments or Clarification

c. Portable fire extinguishers?

☒ []
Yes No

Comments or Clarification

d. Fire control equipment, including special extinguishing equipment and extinguishing agents? (Include type and volume of extinguishing agents in Comments.)

☒ []
Yes No

Sprinklers

Comments or Clarification

e. Spill control equipment?

☒ []
Yes No

Comments or Clarification

f. Decontamination equipment?

☒ []
Yes No

Comments or Clarification

2. Is all of the equipment mentioned in #1 above, operable? (NR 630.21(4))

☒ []
Yes No

Comments or Clarification

3. Is all of the equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency? (NR 630.21(4))

☒ []
Yes No

Comments or Clarification

4. Specify how often the equipment mentioned in #1 is tested to assure proper operation. (NR 630.21(4))

Fire extinguishers -

SCBA - yearly ck'd.

5. Is immediate access provided to internal or external alarms, unless the Department has determined that such devices are not required, for personnel involved in the handling of hazardous waste?

☒ []
Yes No

Comments or Clarification

6. Have the following arrangements, as applicable, been made involving emergency organizations? (NR 630.21(6))

- a. If more than one police and fire department may respond to an emergency, have agreements designating primary authority and support roles been made? (NR 630.6)(b))

[] []
Yes No

N/A

Comments or Clarification

- b. Have agreements with state emergency response teams, emergency response contractors and equipment suppliers been made to provide response? (NR 630.21(6)(c))

[] []
Yes No

N/A

Comments or Clarification

- c. Arrangements to familiarize local hospitals with the properties of the hazardous waste handled and the types of injuries or illnesses which could result from an incident? (NR 630.21(6)(d))

☒ []
Yes No

And awareness with local rescue squad is
Comments or Clarification done annually

NOTE: An attempt must be made, as appropriate for the type of wastes and the potential need for services, to contact the emergency organization mentioned in #6a-c above, and make the arrangements outlined. If the organizations decline to participate, the refusal must be documented in the facility's records.

7. Is adequate aisle space provided throughout the hazardous waste facility to allow unobstructed movement of personnel and all emergency equipment mentioned in #1, above? (NR 630.21(5))

☒ Yes ☐ No

Comments or Clarification

For Department Use

J. Personnel Training/Records: (NR 615.05(4)(a)5 & 630.16)

1. Does the facility have a program of classroom instruction of on-the-job training for personnel in hazardous waste management procedures? (NR 630.16(1))

☐ Yes ☐ No

N/A USQG

Comments or Clarification

If the answer is no, then a training program must be developed.

If the answer is yes, then answer the following questions, #2-4 below:

2. Does this program include training of personnel in Contingency Plan implementation? (NR 630.16(1)(a))

☐ Yes ☐ No

✓

Comments or Clarification

3. Are the following items included in the program if applicable? (NR 630.16(1)(b)1-6)

a. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?

☐ Yes ☐ No

N/A
Comments or Clarification

b. Key parameters for automatic waste feed cut-off systems?

☐ Yes ☐ No

Comments or Clarification

c. Communications and/or alarm systems?

☐ Yes ☐ No

Comments or Clarification

d. Response to fires or explosions?

☐ Yes ☐ No

Comments or Clarification

e. Response to groundwater contamination incidents (e.g., spills)?

☐ Yes ☐ No

Comments or Clarification

f. Shutdown of operations (emergency procedures)?

☐ Yes ☐ No

Comments or Clarification

4. Do facility personnel take part in an annual review of the program mentioned in #1 above? (NR 630.16(3))

☐ Yes ☐ No

Comments or Clarification

5. Are records of personnel training maintained at the facility? (NR 630.16(4))

☐ Yes ☐ No

Comments or Clarification

If the answer is no, then these records must be developed and maintained at the facility.

If the answer is yes, then answer the following question, #6.

6. Which of the following items are included in the personnel training records?
(NR 630.16(4)(a)-(d))

a. Job titles and the name of the employee filling each job?

☐ Yes ☐ No

Comments or Clarification

b. Job descriptions?

☐ Yes ☐ No

Comments or Clarification

c. Description of training required for each position?

☐ Yes ☐ No

Comments or Clarification

d. Written documentation that training or job experience has been given and completed?

☐ Yes ☐ No

Comments or Clarification

NOTE: Training records of current personnel must be kept until facility closure. Training records of former employees must be kept for at least 3 years from the date the employee last worked at the facility. Personnel training records must accompany personnel transferred within the same company. (NR 630.16(5))

For Department Use

K. Other Requirements

1. Does the generator have spill containment tanks?
(NR 615.05(5))

☐ Yes ☒ No

Comments or Clarification

If the answer is yes, then complete the appropriate attachment.

2. Does the generator combine absorbent material with waste generated on site?
(NR 615.05(6))

☐ Yes ☒ No

Comments or Clarification

If the answer is yes, complete Attachment 10.

For Department Use

III. FACILITY STATUS EVALUATION

A. Facility Classification Based on District Verification: VSQG

Signature: Carol N. Schmitt Date: 7-10-91

This facility is also subject to regulation as a:

- ☐ Treatment Facility
- ☐ Exempt Treatment Facility (specify) _____
- ☐ Transfer Facility
- ☐ Storage Facility
- ☐ Exempt Storage Facility (specify) _____
- ☐ Disposal Facility
- ☐ Transporter

For Department Use

NOTE: Compliance Evaluation Inspection Form and CME Form (Form 4430-5) must accompany this form.

Submission of this form is voluntary.

A. GENERAL INFORMATION (WDNR USE ONLY):

Facility Name (As shown in a current EPA Notification Printout) Badger Paper Mills Inc.	EPA ID Number WI11DC06130322	FID Number 1111111111
Facility Location 1011 1st Street	Notification Status (As shown in a current EPA Notification Printout) (Circle all that apply)	
City, State, Zip Code Wausau, WI 54157	<input checked="" type="checkbox"/> LQG <input type="checkbox"/> SQG <input type="checkbox"/> VSQG <input type="checkbox"/> TRANS <input type="checkbox"/> TSD	
Compliance Evaluation Inspection Date	Other _____	
WDNR Specialist Name/Telephone Number 54157 462 371		

B. STATUS CHANGE INFORMATION - TO BE COMPLETED BY FACILITY (Check all that apply):

Change This Facility's Notification Status To:

☐ 1. NON-HANDLER

This facility does not generate, transport, treat, store or dispose of any hazardous waste, and does not intend to conduct such activities in the future.

☒ 2. VERY SMALL QUANTITY GENERATOR

This facility is a very small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 100 kg or 220 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate less than the following at any time: (a) 1,000 kg or 2,205 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material. We intend to meet these generation and accumulation requirements in the future.

☐ 3. SMALL QUANTITY GENERATOR

This facility is a small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; accumulate less than the following at any time: (a) 6,000 kg or 13,230 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or above-ground tanks for less than 180 or 270 days (depends on distance waste is transported). We intend to meet these generation and accumulation requirements in the future.

☐ 4. LARGE QUANTITY GENERATOR

This facility is a large quantity generator of hazardous waste. This means that we generate more than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, or (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or aboveground tanks for less than 90 days. We intend to meet these generation and accumulation requirements in the future.

☐ 5. TRANSPORTER

This facility transports hazardous waste by air, rail, highway or water.

☐ 6. TREATER/STORER/DISPOSER

This facility treats, stores for greater than 90 days, and/or disposes of hazardous waste on-site.

☐ 7. OTHER: This facility is _____

This category may be used for facilities involved with Waste-As-Fuel, Used Oil, etc. activities, Non-Regulated Installations (as indicated in columns 1 or 11-14 in the EPA Notification Printout), or other. Please explain.

C. CERTIFICATION:

The following certification must be signed by the owner or operator of the facility, or on behalf of the owner or operator, by an individual who meets the requirements of s. NR 181.55(3)(b) or s. NR 680.05(2)(b), Wis. Adm. Code.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Owner and/or Operator (Print or type) RALPH C KINZEL	Signature <i>Ralph Kinzel</i>	Date 7-10-91
Title MANAGER ENVIRONMENTAL AFFAIRS	Telephone Number (Include area code) 715-582-4551	
Mailing Address (If different than above) PO BOX 149	City, State, Zip Code WAUSAU WI 54157	

NOTE: Compliance Evaluation Inspection Form and CME Form (Form 4430-5) must accompany this form.

Submission of this form is voluntary.

A. GENERAL INFORMATION (WDNR USE ONLY):

Facility Name (As shown in a current EPA Notification Printout) <i>Badger Paper Mills Inc.</i>	EPA ID Number <i>WI 10006130322</i>	FID Number <i>43810392150</i>
Facility Location <i>West Front Street</i>	Notification Status (As shown in a current EPA Notification Printout) (Circle all that apply)	
City, State, Zip Code <i>Peshigo, WI 54157</i>	<input checked="" type="checkbox"/> LQG <input type="checkbox"/> SQG <input type="checkbox"/> VSQG <input type="checkbox"/> TRANS <input type="checkbox"/> TSD	
Compliance Evaluation Inspection Date	Other _____	
WDNR Specialist Name/Telephone Number <i>Carol M. Schmidt (414) 492-5871</i>		

B. STATUS CHANGE INFORMATION - TO BE COMPLETED BY FACILITY (Check all that apply):

Change This Facility's Notification Status To:

☐ 1. NON-HANDLER

This facility does not generate, transport, treat, store or dispose of any hazardous waste, and does not intend to conduct such activities in the future.

☒ 2. VERY SMALL QUANTITY GENERATOR *3NI*

This facility is a very small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 100 kg or 220 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate less than the following at any time: (a) 1,000 kg or 2,205 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material. We intend to meet these generation and accumulation requirements in the future.

☐ 3. SMALL QUANTITY GENERATOR

This facility is a small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; accumulate less than the following at any time: (a) 6,000 kg or 13,230 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or above-ground tanks for less than 180 or 270 days (depends on distance waste is transported). We intend to meet these generation and accumulation requirements in the future.

☐ 4. LARGE QUANTITY GENERATOR

This facility is a large quantity generator of hazardous waste. This means that we generate more than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, or (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or aboveground tanks for less than 90 days. We intend to meet these generation and accumulation requirements in the future.

☐ 5. TRANSPORTER

This facility transports hazardous waste by air, rail, highway or water.

☐ 6. TREATER/STORER/DISPOSER

This facility treats, stores for greater than 90 days, and/or disposes of hazardous waste on-site.

☐ 7. OTHER: This facility is _____

This category may be used for facilities involved with Waste-As-Fuel, Used Oil, etc. activities, Non-Regulated Installations (as indicated in columns 1 or 11-14 in the EPA Notification Printout), or other. Please explain.

C. CERTIFICATION:

The following certification must be signed by the owner or operator of the facility, or on behalf of the owner or operator, by an individual who meets the requirements of s. NR 181.55(3)(b) or s. NR 680.05(2)(b), Wis. Adm. Code.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Owner and/or Operator (Print or type) <i>RALPH C KINZEL</i>	Signature <i>Ralph C Kinzel</i>	Date <i>7-10-91</i>
Title <i>MANAGER ENVIRONMENTAL AFFAIRS</i>	Telephone Number (Include area code) <i>715-582-4551</i>	
Mailing Address (If different than above) <i>PO BOX 149</i>	City, State, Zip Code <i>PESHIGO WI 54157</i>	

Wisconsin Department of Natural Resources
HAZARDOUS WASTE FACILITY AUDIT (Form 4400-114) - DATE PRINTED: 06/12/91

EPA ID#:..... WID006130322
DNR FID#:..... 438039250
Facility Name:..... BADGER PAPER MILLS INC
Location Address:..... WEST FRONT STREET
Location City/State/Zip:.. PESHTIGO, WI 54157
Mailing Address:..... PO BOX 149
Mailing City/State/Zip:.. PESHTIGO, WI 54157
Contact Name & Title:.... RALPH C KINZEL MGR OF ENV AFF
Telephone#:..... 715/582-4551
Facility Owner:..... BADGER PAPER MILLS
Haz Waste Activity as:... Generator - YES Transporter - YES Treater/Storer/Disp - NO
Haz Waste Status:..... LARGE QNTY GENERATOR
Haz Waste Reporting:..... ANNUAL REPORT REQUIRED

District: LAKE MICHIGAN
County: MARINETTE

ACTION REQUIRED--Make the following changes to this facility record:

- () Facility Name _____
() Location Addr _____
() Loc City, State, Zip _____
For location change, new EPA ID# applied for: () Yes () No - explain in comments below
() Mailing Addr _____
() Mailing City, State, Zip _____
() Contact Name & Title _____
() Telephone Number _____
() Facility Owner _____
(X) Haz Waste Status -- change to: (Circle all that apply, only one generator category)
LQG SQG VSQG NON-GEN TRANS TREATER STORER DISP RECYC
OTHER - explain: _____

- (X) Haz Waste Reporting -- change to: 1101 = 3
() Reporting (X) Non-reporting
() Closure of facility
() Closed/Moved -- facility no longer in operation at this location
() Complete closure of licensed TSD activity
() Partial closure of licensed TSD activity -- unit closed:

COMMENTS: Inspection of July 10, 1991, Verifies VSQG activity. Change from
Admitted with inspection forms by C. Schmidt.

WDNR District Auditor -- changes approved & processed by:

Name & Dist Carol M. Schmidt Phone# 414-492-5871 Date 7-16-91

HWMS Bureau Auditor -- changes approved & processed by:

Name _____ Phone# _____ Date _____

If change not approved, comment: _____

PSS Bureau Auditor -- changes processed by:

Name Rob Rasmussen Phone# 267-7567 Date 9-6-91

If change not processed, comment: _____

US EPA Region V Information Section -- changes processed by:

Name _____ Phone# _____ Date _____

If change not processed, comment: _____

RECEIVED
AUG 28 91
BUREAU OF SOLID WASTE
HAZARDOUS WASTE MANAGEMENT



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

WID006130322

REACKNOWLEDGEMENT

BADGER PAPER MILLS INC
PO BOX 149
PESHIGO

WI 54157

INSTALLATION ADDRESS

WEST FRONT STREET
PESHIGO

WI 54157



U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	WID006130322
I. NAME OF INSTALLATION	BADGER PAPER MILLS INC
II. INSTALLATION MAILING ADDRESS	PO BOX 149 PESHTIGO, WI 54157
III. LOCATION OF INSTALLATION	W FRONT ST PESHTIGO, WI 54157

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS	

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
FWID006130322		800819

I. NAME OF INSTALLATION

B	A	D	G	E	R	P	A	P	E	R	M	I	L	L	S	I	N	C
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX				
3	PO BOX 149			
CITY OR TOWN				
4	PESHTIGO			
ST.				
W	I			
ZIP CODE				
5	4	1	5	7

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER				
5	WEST FRONT STREET			
CITY OR TOWN				
6	PESHTIGO			
ST.				
W	I			
ZIP CODE				
5	4	1	5	7

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2	7
K	1
I	5
N	5
Z	8
E	2
L	4
R	5
M	5
G	1
R	
E	
N	
V	
I	
R	
O	
A	
F	
F	
A	
I	
R	
S	

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER	
8	BADGER PAPER MILLS

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL	M
M = NON-FEDERAL	

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

<input checked="" type="checkbox"/> A. GENERATION	<input checked="" type="checkbox"/> B. TRANSPORTATION (complete item VII)
<input type="checkbox"/> C. TREAT/STORE/DISPOSE	<input type="checkbox"/> D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

<input type="checkbox"/> A. AIR	<input type="checkbox"/> B. RAIL	<input checked="" type="checkbox"/> C. HIGHWAY	<input type="checkbox"/> D. WATER	<input type="checkbox"/> E. OTHER (specify):
---------------------------------	----------------------------------	--	-----------------------------------	--

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

<input checked="" type="checkbox"/> A. FIRST NOTIFICATION	<input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete item C)
C. INSTALLATION'S EPA I.D. NO.	
WID006130322	

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

5	W	W	I	D	0	0	6	1	3	0	3	2	2	2	1
1	2													13	14

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE Raymond J. DeLaat	NAME & OFFICIAL TITLE (type or print) Raymond J. DeLaat Manager of Manufacturing	DATE SIGNED 8/15/80
---------------------------------------	---	-------------------------------